



February 06, 2009  
Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: TON Services, Inc. - 2008 CPNI Certification Filing  
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 07, 2009, enclosed for filing please find the 2008 Annual CPNI Compliance Certification submitted on behalf of TON Services, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

Robin Norton  
Consultant to TON Services, Inc.

RN/lm

cc: Best Copy and Printing, Inc. - [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)  
cc: Gary Barlow - TON  
file: TON - FCC  
tms: FCCx0901

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year: **2008**

Name of company covered by this certification: **TON Services, Inc.**

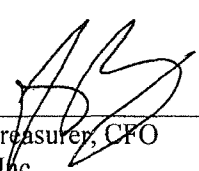
Form 499 Filer ID: **819402**

Name of signatory: **Gary Barlow**

Title of signatory: **Treasurer, CFO**

I, **Gary Barlow**, certify and state that:

1. I am the **Treasurer, CFO** of **TON Services, Inc.** and, acting as an agent of the company, I have personal knowledge of **TON Services, Inc.** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **TON Services, Inc.** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

  
\_\_\_\_\_  
Gary Barlow, Treasurer, CFO  
TON Services, Inc.

**2/3/09**  
\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

**Statement of CPNI Procedures and Compliance  
For 2008  
TON Services Inc.**

TON Services Inc. offers prepaid debit cards, prepaid wireless service and payphone service and as such provides casual calling services to transient users with whom it does not have a subscriber relationship. Therefore, we do not have any information that relates to the quantity, technical configuration, type, or location of the customer's service and do not validate any name or address information obtained. Because the service is provided outside of any subscribed service relationship, we do not obtain any CPNI that can be used for marketing purposes.

We have processes in place to safeguard the call detail information that we obtain through the use of our debit card and prepaid wireless services from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to these records.

Specifically, we do not provide call detail to any debit card customer at any time. Such detail and any other information that we have is only provided to the FBI or police who officially request it via subpoena and who can prove they are a legitimate law enforcement agency.

We will provide call detail to our prepaid wireless customers (who do not otherwise receive it). Each prepaid wireless customer (i.e., end user) can have access to his/her call detail and balance information online. However, this requires a password that the customer creates. Alternatively, the customer may contact our customer service department, and after providing this self-created password to the customer service agent, may obtain call detail and balance remaining. In the event the wireless customer has forgotten his password, he/she will ONLY be provided information by the customer service agent after the subscriber has provided recent calling pattern/phone#/etc that only he/she will know. Home address and customer name information is not acceptable as a means of verification as it can be readily obtained over the internet.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records that we obtain from the provision of our services. Since we do not have presubscribed customers, we do not have the ability to notify customers of any such breach.

We have not had any such breaches during 2008, but have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release or disclosure of call detail records in calendar year 2008.

We have no information with respect to the processes pretexters may use to attempt to access CPNI.